

1056

T. J. KLUMPP,  
individually doing  
business as THE KLUMPP  
MOTOR COMPANY  
Plaintiff

L A W  
IN THE CIRCUIT COURT OF  
BALDWIN COUNTY, ALABAMA


VS

G. B. CARPENTER  
Defendant

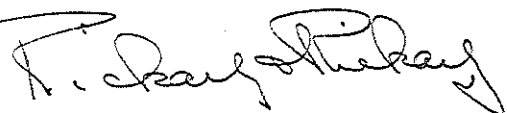
COUNT I: The Plaintiff claims of the Defendant ONE HUNDRED SIXTY TWO and 58/100 DOLLARS due from him by account on the tenth day of November, Nineteen Hundred Forty six, which sum of money with interest thereon is still unpaid.

COUNT II: The Plaintiff claims of the Defendant the sum of ONE HUNDRED SIXTY TWO and 58/100 DOLLARS for work and labor done for Defendant by the Plaintiff between August twentieth, Nineteen Hundred Forty six and October tenth, Nineteen Hundred Forty Six, at Defendant's request and that said work was performed on one GMC half ton Pick Up Truck, Motor Number A 228117575, License Number 514-1163; which sum of money together with interest thereon is still unpaid.

The Plaintiff claims a lien on said truck for the money aforesaid.

  
Attorneys for Plaintiff.

The Account sued on is evidenced by an itemized verified statement filed herewith.



105-6

T. J. KLUMPP, individually  
doing business as THE KLUMPP  
MOTOR COMPANY  
Plaintiff

vs

G. B. CARPENTER  
Defendant

COMPLAINT

FILED

APR 17 1947

Alice L. Duck, Clerk

Rec in office 4-19-47  
*Saylor Wilkins*  
Sheriff

Executed this 25th  
day of April 1947  
By serving a copy  
of the within summons  
& complaint on  
G. B. Carpenter  
*Saylor Wilkins*  
Sheriff

ATTACHMENT.

**The State of Alabama,**  
Baldwin County

TO ANY SHERIFF OF THE STATE OF ALABAMA:

WHEREAS, T. J. KLUMPP, individually doing business as THE KLUMPP  
MOTOR COMPANY

Alice J.  
hath complained on oath to me, ~~ROBERT S.~~ DUCK, Clerk of Circuit Court of Baldwin County, Ala.,

that G. B. Carpenter

is justly indebted to the Plaintiff T. J. KLUMPP, individually doing business as  
THE KLUMPP MOTOR COMPANY

in the sum of ONE HUNDRED SIXTY TWO and 58/100 Dollars, and

T. J. KLUMPP, individually doing business having made affidavit and given bond  
as THE KLUMPP MOTOR COMPANY

as required by law, in such cases, you are hereby commanded to attach so much of the ~~estate~~ <sup>TRUCK</sup> of

G. B. CARPENTER

~~as will be sufficient~~ to satisfy said debt and costs, according to the complaint; and such estate, so  
attached unless replevied, so to secure, that the same may be liable to further proceedings thereon to be  
had by the Circuit Court of Baldwin County, Ala., at a term thereof, to be held at the Court House of said

County, on \_\_\_\_\_ Monday of \_\_\_\_\_ 193\_\_\_\_\_

next; when and where you must make known to said Court how you have executed this Writ.

WITNESS, my hand, this 17 day of April A. D. 1934

Alice J. Duck Clerk.

No. 1056 *Wade*  
*W. J. Klumpp*  
*South West*  
*+ South*

## ATTACHMENT

T. J. KLUMPP, individually  
doing business as THE KLUMPP  
MOTOR COMPANY

Plaintiff

Vs. { ATTACHMENT

G. B. CARPENTER  
Defendant

Issued 14-17, 1947

MOORE PRINTING CO.,

FILED

APR 17 1947

ALICE J. DUCK, Clerk

Received in Sheriff's Office  
this 19 day of April, 1947  
TAYLOR WILKINS, Sheriff

*Executed by*  
*taking into my*  
*Possession one*  
*1942 G.M.C. 6 ton*  
*truck. tag no 5H1 1163*  
*motor no A-228117575*

*This 25th day of*  
*April 1947*

*Taylor Wilkins*  
*Sheriff*

**The State of Alabama,** {  
Baldwin County.

## CIRCUIT COURT AT BAY MINETTE, ALA.

Know all Men by these Presents, That we, T. J. KLUMPP and

and

....., of the County of Baldwin, Alabama

are held and firmly bound unto G. B. CARPENTER

in the sum of THREE HUNDRED TWENTY FIVE and 16/100 Dollars, to

be paid to the said G. B. CARPENTER

heirs, executors, administrators, or assigns, for which payment, well and truly to be made, we bind ourselves and each of us, our and each of our heirs, executors, and administrators, jointly and severally, firmly by these presents.

Sealed with our seals and dated the ..... day of ....., 192

The Condition of this Obligation is such:

That whereas, the above bounden,

..... ha....., on the day of the date

hereof, prayed an Attachment at the suit of T. J. KLUMPP, doing business as THE  
THE KLUMPP MOTORE COMPANY  
and ..... against the Truck ~~estate~~ of above named

G. B. CARPENTER

for the sum of ONE HUNDRED SIXTY TWO and 58/100 Dollars,  
and hath obtained the same, returnable to the Circuit Court of Baldwin County:

Now, if the said T. J. KLUMPP, individually doing business as THE KLUMPP  
MOTOR COMPANY  
should prosecute said Attachment to effect, and pay the said Defendant all such damages as he  
may sustain by the wrongful or vexatious suing out said Attachment, then the above obligation to be void; otherwise to remain in full force and effect.

And we and each of us hereby waive all rights of claims of exemption we or either of us have now, or may hereafter have, under the Constitution and Laws of the State of Alabama.

Signed, Sealed, and delivered the date above written.

*have bond signed*

*T. J. Klumpp* ..... (Seal)

*D. Moser* ..... (Seal)

*T. W. Little* ..... (Seal)

..... (Seal)

Approved, this 17 day of April, 1927

*Miss J. Smith* ..... Clerk.

The State of Alabama,  
Baldwin County.

## CIRCUIT COURT AT BAY MINETTE, ALA.

Before me, E. GL. RICKARBY, Jr., a Notary Public

in and for said County, personally appeared T. J. KLUMPP, individually doing business as the KLUMPP MOTOR COMPANY

who, being duly sworn, on oath saith that G. B. CARPENTER

is justly indebted to

THE KLUMPP MOTOR COMPANY

in the sum of ONE HUNDRED SIXTY TWO and 58/100 Dollars, which said

amount is justly due after allowing all just offsets and discounts, and that the said sum is for

labor and materials contributed to the production, manufacture and

repair of one Truck, GMC HALF TON PICK UP TRUCK, Motor Number

A 228117575, License Number 514-1163, by the KLUMPP MOTOR COMPANY as

a Mechanic and that he claims a lien thereon under the provisions in

Section 25, Article 3, Title 33 of the 1940 Code of Alabama.

and that this Attachment is not sued out for the purpose of vexing or harassing the Defendant, or other improper motive.

Subscribed and sworn to before me this 17<sup>th</sup> day of March 1947.

The State of Alabama,

Baldwin County.

CIRCUIT COURT

AT BAY MINETTE, ALA.

T. J. KLUMPP individually doing  
business as THE KLUMPP MOTORE  
COMPANY

TO

G. B. CARPENTER

Attachment Bond and Affidavit

Filed this the 17<sup>th</sup> day  
of APR 17 1947

ALICE I. BUCK, Clerk

RICKARBY &amp; RICKARBY

Attorney.

The State of Alabama,  
Baldwin County

KNOW ALL MEN BY THESE PRESENTS, That we,

L. B. Carpenter

are held and firmly bound unto

in the sum of One Thousand Five Hundred DOLLARS,

for the payment of which, well and truly to be made, we jointly and severally bind ourselves, our heirs, executors and administrators, jointly and severally. And for the payment of the above bond, we waive our right of exemption as to personal property, under the Constitution and Laws of the State of Alabama.

Sealed with our seals and dated this \_\_\_\_\_ day of \_\_\_\_\_ 193\_\_\_\_

THE CONDITION OF THE ABOVE OBLIGATION IS SUCH, That whereas a Writ of Attach-

ment issued by Alice J. Deak, circuit clerk

at the suit of said J. J. Klumpp against

the estate of the above named L. B. Carpenter,

returnable before the said next term of Circuit Court

as aforesaid, at his office on the \_\_\_\_\_ day of \_\_\_\_\_ 193\_\_\_\_, for the

sum of One hundred sixty two and 58/100 DOLLARS,

has been placed in the hands of Jaylor Wilkins, Sheriff

in and for the said County, and has been levied by him upon the following property, to-wit:

One 1942 L. M. C. 1 half ton truck  
License Number 5 H 1 1163  
Motor Number A-22 8112575

and whereas, the property has been delivered to the said \_\_\_\_\_

on his entering into this bond.

NOW, THEREFORE, If the Defendant shall fail in said action, he or his securities shall return the specific property attached and above mentioned to the said Sheriff, within ten days after judgment against said Defendant in this suit, then this obligation to be void, otherwise to remain in full force and effect.

Taken and approved this

30th

day of

April

1947

Jaylor Wilkins  
Sheriff

L. B. Carpenter (L. S.)

N. F. Thompson (L. S.)

E. D. Middleton (L. S.)

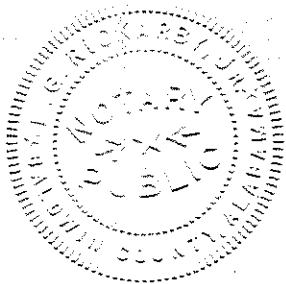
STATE OF ALABAMA  
COUNTY OF BALDWIN

Before me the undersigned Notary Public personally appeared T. J. KLUMPP, individually doing business as THE KLUMPP MOTOR COMPANY, who being first duly sworn deposes and says that he is the owner of the KLUMPP MOTOR COMPANY, and as such has knowledge of the correctness of the account between said firm and G. B. CARPENTER and that the attached itemized statement correctly shows such account.

T. J. Klumpp

Subscribed and sworn to before me on this the 17 day  
of March, 1947.

E. West  
Notary Public, Baldwin County, Alabama.





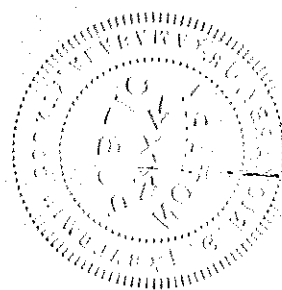
105-6

T. J. KLUMPP doing business  
individually as THE KLUMPP  
MOTOR COMPANY,  
Plaintiff

vs

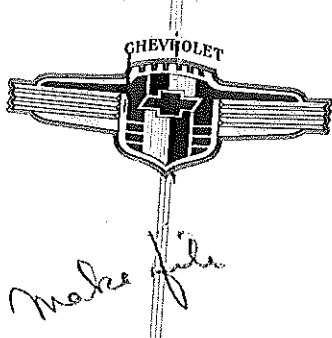
G. B. CARPENTER  
Defendant

AFFIDAVIT



FILED  
APR 17 1947  
ALICE J. DUCK, Clerk

RICKARBY & RICKARBY  
ATTORNEYS FOR PLAINTIFF



STATEMENT

# Klumpp Motor Company

CHEVROLET - OLDSMOBILE

Alabama's Oldest Chevrolet Dealership

FAIRHOPE and ROBERTSDALE, ALA.

February 20, 1947

IN ACCOUNT WITH

Mr. S. B. Carpenter

Loxley, Alabama

G.M.C.  $\frac{1}{2}$  Ton Pick Up Truk Motor # A.-228117575 License# 5H-1166

FORM NO DEA 4252 LITHO IN U.S.A.

All accounts are due and payable first of month following date of purchase.

Accounts are due and payable first of month following date of purchase.						
DATE	DETAIL	CHARGES		CREDITS		BALANCE
	ACCOUNT RENDERED					
8/20/46	Inv# 9444	19.	62			
8/26/46	Inv# 9488	3.	04			
8/27/46	Inv# 9498	20.	78			
9/13/46	Inv# 9542	97.	58			
10/1/46	Inv# 15109	7.	42			
10/10/46	Inv# 15172	14.	14			
						162.58

SUMMONS AND COMPLAINT

THE STATE OF ALABAMA, }  
BALDWIN COUNTY

CIRCUIT COURT BALDWIN COUNTY

No. \_\_\_\_\_

TERM, 194\_\_\_\_\_

TO ANY SHERIFF OF THE STATE OF ALABAMA:

You are hereby commanded to summon G. B. CARPENTER

to appear and plead, answer or demur, within thirty days from the service hereof, to the Complaint filed in  
the Circuit Court of Baldwin County, State of Alabama, at Bay Minette, against him

\_\_\_\_\_, Defendant\_\_\_\_\_

by T. J. KLUMPP, individually doing business as THE KLUMPP MOTORS  
COMPANY

\_\_\_\_\_, Plaintiff\_\_\_\_\_

Witness my hand this 17 day of April 1947

Alice J. Luck Clerk.

No. \_\_\_\_\_ Page \_\_\_\_\_

**THE STATE OF ALABAMA**  
BALDWIN COUNTY

**CIRCUIT COURT**

**T. J. KLUMPP**, individually doing  
business as **THE KLUMPP MOTOR**  
**COMPANY**

Plaintiffs

vs.

**G. B. CARPENTER**

Defendants

**SUMMONS AND COMPLAINT**

Filed **FILED** 194

**APR 17 1947** Clerk

**ALICE J. DUCK, Clerk**

**RICKARBY & RICKARBY**

Plaintiff's Attorney

Defendant's Attorney

Moore Printing Co., Bay Minette, Ala.

Defendant lives at

**LOXLEY, ALABAMA**

RECEIVED IN OFFICE

194

Sheriff

I have executed this summons

this 194

by leaving a copy with

Sheriff

Deputy Sheriff